

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

**STIPULATION FOR THE ENTRY OF AN ORDER ADJOURNING HEARING ON
CITY OF DETROIT’S MOTION FOR (I) DETERMINATION THAT THE
DETROIT POLICE LIEUTENANTS AND SERGEANTS ASSOCIATION HAS
VIOLATED THE TERMS OF THE CITY OF DETROIT’S CONFIRMED
PLAN OF ADJUSTMENT AND THE ORDER CONFIRMING IT; AND
(II) ORDER (A) ENJOINING FURTHER VIOLATIONS AND (B) REQUIRING
DISMISSAL OF STATE ACTIONS**

The City of Detroit, Michigan (“City”) and the Detroit Police Lieutenants and Sergeants Association (“DPLSA”), by and through their undersigned counsel, hereby stipulate, agree and request that the court enter the order attached as Exhibit A, adjourning the hearing on City Of Detroit’s Motion For (I) Determination That the Detroit Police Lieutenants and Sergeants Association Has Violated the Terms Of the City Of Detroit’s Confirmed Plan Of Adjustment and the Order Confirming It; and (II) Order (A) Enjoining Further Violations and (B) Requiring Dismissal Of State Actions, currently scheduled for May 6, 2015 at 1:30 pm, to May 27, 2015 at 1:30 pm.

STIPULATED AND AGREED:

<p>ATTORNEYS FOR THE CITY</p> <p>By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 green@millercanfield.com swansonm@millercanfield.com</p> <p>-and-</p> <p>Charles N. Raimi (P29746) Deputy Corporation Counsel City of Detroit Law Department 2 Woodward Avenue, Suite 500 Coleman A. Young Municipal Center Detroit, Michigan 48226 Telephone: (313) 237-5037 Facsimile: (313) 224-5505 raimic@detroitmi.gov</p>	<p>ATTORNEYS FOR DETROIT POLICE LIEUTENANTS AND SERGEANTS ASSOCIATION</p> <p>By: <u>/s/ Barbara A. Patek</u> Barbara A. Patek (P34666) ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C. 400 Galleria Officentre, Suite 444 Soutfield, MI 48034 Telephone: (248) 827-4100 Facsimile: (248) 827-4106 bpatek@ermanteicher.com</p> <p>-and-</p> <p>Peter P. Sudnick (P30768) SUDNICKLAW, P.C. 2555 Crooks Road, Suite 150 Troy, Michigan 48084 Telephone: (248) 643-8533 psudnick@sudnicklaw.com</p>
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DATED: April 17, 2015

EXHIBIT A
IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

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**ORDER ADJOURNING HEARING ON CITY OF DETROIT'S MOTION FOR (I)
DETERMINATION THAT THE DETROIT POLICE LIEUTENANTS AND
SERGEANTS ASSOCIATION HAS VIOLATED THE TERMS OF THE CITY OF
DETROIT'S CONFIRMED PLAN OF ADJUSTMENT AND THE ORDER
CONFIRMING IT; AND (II) ORDER (A) ENJOINING FURTHER VIOLATIONS AND
(B) REQUIRING DISMISSAL OF STATE ACTIONS**

This matter having come before the Court on the Stipulation for the Entry of an Order Adjourning the Hearing on City Of Detroit's Motion For (I) Determination That the Detroit Police Lieutenants and Sergeants Association Has Violated the Terms Of the City Of Detroit's Confirmed Plan Of Adjustment and the Order Confirming It; and (II) Order (A) Enjoining Further Violations and (B) Requiring Dismissal Of State Actions ("Motion"); and the Court being fully advised in the premises;

IT IS ORDERED that the hearing on the Motion is adjourned from May 6, 2015 at 1:30 pm, to May 27, 2015 at 1:30 pm.